

BONGO PRODUCTIONS, LLC, et al.,

V.

CARTER LAWRENCE, et al.,

Defendants.

JOINT MEDIATION REPORT

The Parties to this action pursuant to the Court’s Initial Case Management Order entered on August 23, 2021 (Doc. No. 29) hereby notify the Court that they have made a good faith effort to resolve the case. This case is a constitutional challenge to H.B. 1182/S.B.1224, 112th Gen. Assemb., 1st Reg. Sess. (Tenn. 2021) (“the Act”), enacted by the Tennessee General Assembly which requires designated businesses to post a sign regarding their policies on restroom use. The core issue in this case involves a dispute on the law, namely whether the Act is unconstitutional under the First Amendment. Plaintiffs also do not seek monetary damages, but instead have requested that the law be declared unconstitutional and injunctive relief be granted. For these reasons, the parties agree that mediation or a settlement conference will not resolve the dispute between the parties. The parties do expect the case will be resolved through dispositive motions and not require a trial.

Dated: December 15, 2021

Respectfully submitted,

/s/ *Thomas H. Castelli*

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CERTIFICATE OF SERVICE

I hereby certify that on December 15, 2021, a true and correct copy of the foregoing report was served on the Tennessee Attorney General's Office, counsel for all Defendants, via the Court's ECF/CM system.

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/s/ Thomas H. Castelli
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